

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JC USA, Inc., *et al.*,<sup>1</sup>  
Debtors.

Don A. Beskrone, Chapter 7 Trustee for  
JC USA, Inc., *et al.*,

Plaintiff,

v.

DS Lakeshore LP,

Defendant.

Chapter 7

Case No. 23-10585 (JKS)  
(Jointly Administered)

**Related D.I. 545**

Adv. Proc. No: 25-50695-JKS

**AFFIDAVIT IN SUPPORT OF MOTION OF DON A. BESKRONE, CHAPTER 7  
TRUSTEE, TO APPROVE SETTLEMENT OF CERTAIN CHAPTER 5 CLAIMS  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019**

STATE OF DELAWARE )  
                        )  
                        ) SS.  
COUNTY OF NEW CASTLE )

Don A. Beskrone declares as follows:

1. I am the duly appointed Chapter 7 Trustee of the above-captioned Debtors. I have read the *Motion of Don A. Beskrone, Chapter 7 Trustee, to Approve Settlement of Certain Chapter 5 Claims Pursuant to Federal Rule of Bankruptcy Procedure 9019* (the “Motion”)<sup>2</sup> filed in support of settlement (the “Settlements”) of claims in the above-captioned bankruptcy cases and adversary proceeding and am familiar with the information contained therein and the settlement

<sup>1</sup> The Debtors in these cases, along with the last four digits of their federal tax identification numbers, are: JC USA, Inc. (0028), JC Franchising, Inc. (7656), New JC Holdings, Inc. (1506), JC Acquisition, Inc. (2395), JC Inter. Holdings, Inc. (3621) JC Hold, LLC (4170).

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Objection.  
{02133588;v1 }

agreements (the “Settlement Agreements”) attached thereto. The information contained herein is true and correct to the best of my knowledge and belief.

2. Based on my business judgment, and for all the reasons set forth the Motion, the Settlements as proposed in the Motion and the Settlement Agreements are fair, reasonable, and in the best interest of the Debtors’ estates.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 17, 2025

/s/ Don A. Beskrone

Don A. Beskrone (DE Bar No. 4380)  
Chapter 7 Trustee